

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
SHANNON HARP	*	VIOLATION: 18 U.S.C. § 2
a/k/a "Shannon L. Taylor"		18 U.S.C. § 1343
"Shannon L. Harp"	*	
"Shannon L. Harp, Jr."		
"Shannon L. Harpe"	*	
	*	

FACTUAL BASIS

Should this matter have been tried before a jury, the government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits, including the testimony of special agents from the Federal Bureau of Investigation (FBI), the Marriott and various financial institutions:

The defendant, **SHANNON HARP, a/k/a “Shannon L. Taylor”, “Shannon L. Harp”, “Shannon L. Harp, Jr.” and “Shannon L. Harpe”** was employed as an assistant controller at either the Marriott Hotel on Canal Street, the J. W. Marriott Hotel on Canal Street. She was promoted to Director of Finance when she moved to the Marriott Hotel Convention Center.

Marriott, in order to provide small denominations of currency for bars, restaurants, and shops in the hotel had in place a system by which small bills were delivered to the hotels from Marriott accounts at the Whitney National Bank.

In order to have an armored car deliver the currency to the Marriott property, a Marriott internal document called a “change order” was executed by Marriott financial personnel.

When the cash was delivered, a Marriott employee would sign for the cash and the money would be dispersed to bars, shops and restaurants at the Marriott property to make change for customers.

At a later time, larger bills accumulated after making change would be collected and deposited back into Marriott accounts.

Marriott had in place an interstate computer system titled “Virtual Private Network.”

Accounting entries concerning the deposits back into the Marriott accounts would be made on Marriott computers in New Orleans, Louisiana and transmitted via interstate wire to the Marriott control computer in Frederick, Maryland.

Beginning at a time unknown, but from in or around May 2003 to in or around July 2006, in the Eastern District of Louisiana, the defendant **SHANNON HARP**, knowingly devised a scheme and artifice to defraud Marriott and obtain money by means of false and fraudulent pretenses, in connection with defendant's **SHANNON HARP** issuing fraudulent change orders for currency purportedly to make change at Marriott Hotel properties bars, restaurants, and shops, but in truth and in fact defendant, **SHANNON HARP** would convert Marriott's money to her own personal use.

SHANNON HARP would also make or cause to be made fraudulent change orders for large dollar amounts and large denominations. When the money would arrive from the financial institution defendant, **SHANNON HARP** would physically remove the money from the Marriott property and convert it to her own personal use. For the purpose of this plea, defendant, **SHANNON HARP** took a total of less than \$2,500,000.00 from Marriott using this scheme and artifice.

SHANNON HARP, in order to conceal her theft, would enter false and fraudulent financial information into the Marriott Virtual Private Network (VPN), and cause the false data to be transmitted through the interstate wire system to Frederick, Maryland, where the main accounting office for Marriott was located.

On February 24, 2006, **HARP** made a fraudulent entry into the VPN indicating that money had been deposited into the Marriott account, when in truth and in fact, it had not.

All of these facts would be proven by the testimony of agents of the Federal Bureau of Investigation, Marriott, as well as documentary evidence from various financial institutions.

CARTER K. D. GUICE, JR. (16771)
Assistant U.S. Attorney
Louisiana Bar Roll No. 16771

Date

SHANNON HARP
Defendant

Date

STEPHEN WILES (17865)
Attorney for Defendant

Date